

MCLAUGHLIN & STERN, LLP
FOUNDED 1898

BRETT R. GALLAWAY

Partner

bgallaway@mclaughlinstern.com
(212) 448-1100

260 MADISON AVENUE
NEW YORK, NEW YORK 10016
(212) 448-1100
FAX (212) 448-0066
www.mclaughlinstern.com

MILLBROOK, NEW YORK
GREAT NECK, NEW YORK
WEST PALM BEACH, FLORIDA
NAPLES, FLORIDA

March 17, 2022

Via ECF

Hon. Katherine Polk Failla
United States District Court
40 Foley Square
Courtroom 618
New York, New York 10007

MEMO ENDORSED

Re: Joint Letter Motion for Extension of Time to Submit Settlement Papers
Gonzalez, et al. v. Ninth Ave. Kitchen Corp., et al., 1:21-cv-1158 (KPF)

Dear Judge Failla:

Pursuant to Local Rule 7.1(d) and Your Honor's Individual Rule of Practice 2(D), Defendants in the above-referenced matter write to respectfully request that the deadline to submit the parties' settlement papers, presently set for March 18, 2022, be extended to April 22, 2022.

The reason for this request is because Defendants are presently abroad in a remote part of Thailand with no means to access electronic communications, and as such are unable to execute the settlement papers until their return in mid-April. There have been three (3) previous requests for an extension of time in this case; two such requests, to extend Defendants' Answer deadline and to extend deadline to file settlement agreement, were granted by the Court. Plaintiffs' counsel consents to this request to extend the deadline to submit the parties' settlement papers to April 22, 2022.

Thank you for your attention to the above.

Respectfully jointly submitted,

/s/ Brett R. Gallaway

Brett R. Gallaway, Esq.
McLaughlin & Stern LLP
260 Madison Avenue
New York, New York 10016
Attorneys for Defendants

Application GRANTED. The parties are directed to submit their settlement papers on or before April 22, 2022. The Clerk of Court is directed to terminate the motion at docket number 30.

Dated: March 18, 2022 SO ORDERED.
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE